

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA-NEWPORT NEWS DIVISION

MALIK JONES) JURY TRIAL DEMANDED
Plaintiff,)
)
v.) Case No.
)
CREDIT CONTORL CORPORATION,)
and AR RESOURCES, INC., and CREDIT)
MANAGEMENT, LP., and CONTRACT)
CALLERS, INC.,)
Defendant.	

COMPLAINT AND DEMAND FOR JURY TRIAL

I. INTRODUCTION

1. This is an action for actual and statutory damages brought by the Plaintiff Malik Jones, an individual consumer, against Defendants, Credit Control Corporation., ("CCC"), Defendant, AR Resources, Inc., ("ARR"), Defendant, Credit Management, LP., ("CM"), Defendant, Contract Callers, INC., ("CC") for violation of the Fair Debt Collections Practices Act, 15 U.S.C § 1692 et seq. (hereinafter "FDCPA"), Which prohibits debt collectors from engaging in abusive, deceptive, and unfair practices.

I. JURISDICTION AND VENUE

2. Jurisdiction of this court arises under 15 U.S.C § 1692k(d) 28 U.S.C 1331.

Venue in this District is proper in that the Defendants transact business in Hampton, Hampton City, Virginia, and the conduct complained of occurred in Hampton, Hampton City, Virginia.

II. PARTIES

3. Plaintiff Malik Jones (hereinafter “Mr. Jones”) is a natural person residing in Newport News, Warrick County, Virginia. Mr. Jones is a consumer as define by the Fair Debt Collection Act, 15 U.S.C §1692a(3). Mr. Jones has been assigned 100 percent of these claims(s) above from Meinaldo Bryan Rosado Ocasio
4. Upon Information and belief, Defendant Credit Control Corporation, is a Virginia corporation with its principal place of business located at 11821 Rock Landing Dr., Newport News VA, 23606.
5. Upon information and belief, Defendant AR Resources, INC., is a Pennsylvania corporation with its principal place of business located at 1777 Sentry Pkwy West Merion Towle Ste 101, Blue Bell, Pennsylvania.
6. Upon information and belief, Defendant Credit Management, LP., is a Texas Corporation with its principal place of business located at 6080 Tennyson Pkwy Ste 100 Plano, TX 75024-6002.

7. Upon information and belief, Defendant Contract Callers Inc, is a Georgia corporation with its principal place of business located at 501 Greene St Ste 302, 3rd Floor, Augusta, GA, 30901 – 4415.
8. Defendant Credit Control Corporation., and AR Resources. INC., Credit Management, LP., and Contract Callers, Inc., is engaged in the collection of debt from consumers using the mail and telephone. Defendants regularly attempt to collect consumers' debts alleged to be due to another's.

IV. FACTS OF THE COMPLAINT

9. Defendant Credit Control Corporation., AR Resources, INC., Credit Management, LP., and Contract Callers Inc., (hereinafter referred to as "Debt Collector") is a "debt collector" as defined by the FDCPA, 15 U.S.C 1692a(6).
10. Around November 29 Mr. Ocasio checked his credit reports through "credit karma."
11. On the report, Mr. Ocasio observed multiple tradelines from Debt Collector.
12. Debt Collector (Credit Control Corporation.,) furnished a trade line of \$63 and \$90, allegedly owned to Riverside Emergency.
13. Debt Collector (AR Resources, Inc.,) furnished a trade line of \$345, allegedly owned to Shenandoah Medical.

14. Debt Collector (Credit Management, LP.,) furnished a trade line of \$393 allegedly owned to COX Communications.
15. Following checking his credit report on November 30, 2021, Mr. Ocasio made a dispute via telephone, however on February 5, 2022 Mr. Ocasio re-checked his reports and Debt Collectors had several communication with the consumer reporting agencies and Debt Collector failed to communicate that the debt was disputed by Mr. Ocasio.
16. Debt Collector's publishing of such inaccurate and incomplete information has severely damaged the personal and credit reputation of Mr. Ocasio and caused severe humiliation, emotional distress, mental anguish, and damages to his FICO scores.

V. FIRST CLAIM FOR RELIEF

(Defendant Credit Control Corporation., AR Resources, Inc., Credit Management, LP., Contract Callers, Inc.,) 15 U.S.C. §1692e(8)

17. Mr. Jones, re-alleges and reincorporates all previous paragraphs as if fully set out herein.
18. The Debt Collector violated the FDCPA.
19. The Debt Collectors violations include, but are not limited to the following:

(a) The Debt collector violated 15 U.S.C § 1692e(8) of the FDCPA
by failing to disclose to the consumer reporting agencies that
the alleged debt was in dispute by Mr. Ocasio.

20. As a result of the above violations of the FDCPA, the defendants are
liable to the Mr. Jones actual damages, statutory damages, and cost.

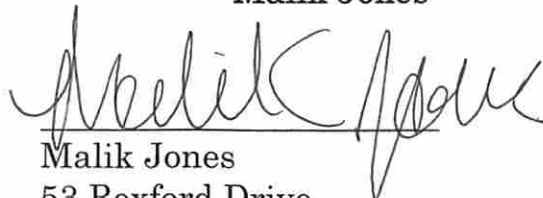
VI. JURY DEMAND AND PRAYER FOR RELIEF

WHEREFORE, Plaintiff Mr. Jones respectfully demands a jury trial
and requests that judgment be entered in favor of Plaintiff and against the
Debt Collector for:

- A. Judgment for the violations occurred for violating the FDCPA;
- B. Actual damages pursuant to 15 U.S.C 1692k(a)(1);
- C. Statutory damages pursuant to 15 U.S.C 1692k(2)(A);
- D. Cost pursuant to 15 U.S.C § 1692k(3);
- E. For such other and further relief as the Court may deem just and proper.

Respectfully submitted:

Malik Jones

A handwritten signature in black ink, appearing to read 'Malik Jones', is written over a horizontal line.

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Newport News DIVISION

Malik Jones
Plaintiff(s),

v.

Civil Action Number: _____

Credit Control Corporation, AR Resources, Inc.,
Credit Management LP, Contract Callers, Inc.,
Defendant(s).

LOCAL RULE 83.1(M) CERTIFICATION

I declare under penalty of perjury that:

No attorney has prepared, or assisted in the preparation of Complaint And Demand for Jury Trial.
(Title of Document)

Malik Jones
Name of *Pro Se* Party (Print or Type)

Malik Jones
Signature of *Pro Se* Party

Executed on: 2/11/22 (Date)

OR

The following attorney(s) prepared or assisted me in preparation of _____.
(Title of Document)

(Name of Attorney)

(Address of Attorney)

(Telephone Number of Attorney)

Prepared, or assisted in the preparation of, this document

(Name of *Pro Se* Party (Print or Type)

Signature of *Pro Se* Party

Executed on: _____ (Date)